

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	Civil Action No. 15-14252-ADB
v.)	
)	
\$438,560 IN UNITED STATES)	
CURRENCY, SEIZED FROM 21 WALSH)	
STREET, CHICOPEE,)	
MASSACHUSETTS,)	
)	
\$3,726 IN UNITED STATES CURRENCY,)	
SEIZED FROM 56 JACKSON STREET,)	
HOLYOKE, MASSACHUSETTS, and)	
)	
ONE 2007 ACURA RDX, BEARING)	
VEHICLE IDENTIFICATION NUMBER)	
5J8TB18507A013768, SEIZED FROM 21)	
WALSH STREET, CHICOPEE,)	
MASSACHUSETTS,)	
)	
Defendants.)	
)	
JAMIL ROMAN,)	
Claimant.)	
)	

JOINT STATUS REPORT

The United States of America and Claimant Jamil Roman (“Roman”), by his undersigned counsel, (collectively, the “Parties”) submit this Joint Status Report in accordance with the Court’s Order dated April 4, 2018 (Docket No. 20). The Parties report the following:

1. On December 31, 2015, the United States filed a Verified Complaint for Forfeiture *In Rem* against the following assets:
 - a. \$438,560 in United States currency, seized from 21 Walsh Street, Chicopee, Massachusetts;

- b. \$3,726 in United States currency, seized from 56 Jackson Street, Holyoke, Massachusetts; and
- c. one 2007 Acura RDX, bearing vehicle identification number 5J8TB18507A013768, seized from 21 Walsh Street, Chicopee, Massachusetts

(collectively, the “Defendant Properties”), seeking forfeiture of the Defendant Properties which are subject to forfeiture to the United States pursuant to 21 U.S.C. § 881(a)(6), because they represent moneys, negotiable instruments, securities, or other things of value furnished or intended to be furnished by any person in exchange for a controlled substance or listed chemical in violation of 21 U.S.C. §§ 841 and/or 846, as proceeds traceable to such an exchange, and/or moneys, negotiable instruments, or securities used or intended to be used to facilitate such a violation.

2. On February 16, 2016, Roman filed an Answer to the Complaint for Forfeiture and a Claim, asserting an interest in the Defendant Properties. *See* Docket No. 11.

3. On March 21, 2016, the Parties filed a joint motion seeking to stay this action, pursuant to 18 U.S.C. § 981(g), because the herein action arises out of the same facts and circumstances as a pending criminal proceeding, *United States v. Gonzalez, et al.* (Criminal Case No. 16-30020-MGM). *See* Docket No. 18. This Court granted the request on the same day. *See* Docket No. 19.

4. The criminal case is ongoing. On May 10, 2017, Roman filed a Motion to Suppress, challenging the search warrant that led to the seizure of the Defendant Properties, and the United States filed an opposition to the motion. *See* Docket Nos. 126, 127, 131, 143 (Criminal Case No. 16-30020-MGM). The matter is currently under advisement. The Court has scheduled the next Status Conference to take place on April 18, 2018. *See* Docket No. 166 (Criminal Case No. 16-30020-MGM).

5. Based on the foregoing, the Parties respectfully request that the stay entered in this case continue until the resolution of the criminal case.

Respectfully Submitted,

JAMIL ROMAN
By his attorney,

/s/ Vincent A. Bongiorno
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Dated: April 11, 2018

CERTIFICATE OF SERVICE

I, Doreen M. Rachal, Assistant United States Attorney, hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

Dated: April 11, 2018

/s/ Doreen M. Rachal
DOREEN M. RACHAL
Assistant United States Attorney